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Plaintiffs for the 22 States*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master File No. 4:07-cv-05944-JST
Case No. 4:13-cv-03234-JST

MDL No. 1917

This Document Relates to:

INDIRECT PURCHASER ACTIONS FOR
THE 22 STATES

**REPLY IN SUPPORT OF UNOPPOSED
MOTION FOR ORDER AUTHORIZING
DISTRIBUTION OF SETTLEMENT
FUNDS**

Hearing Date: July 28, 2022
Time: 2:00 p.m.
Courtroom: 6, 2nd Fl. (Oakland)
Judge: Hon. Jon S. Tigar

1 The Indirect Purchaser Plaintiffs (“IPPs”) hereby submit this Reply in support of their
 2 Motion For An Order Authorizing Distribution of the Settlement Funds in this long-running
 3 litigation, ECF No. 6025 (the “Motion”).

4 *First*, and most importantly, the deadline to oppose IPPs’ Motion was July 7, 2022. No
 5 opposition was filed. Thus, the motion is unopposed.

6 *Second*, IPPs withdraw the request that the Court appoint The Notice Company as the Fund
 7 Administrator because IPPs have determined it is unnecessary. IPPs are filing herewith an Amended
 8 Proposed Order Authorizing Distribution of Settlement Funds which is identical to the Proposed
 9 Order submitted with the Motion (ECF No. 6025-3) except that the paragraphs appointing The
 10 Notice Company as Fund Administrator have been amended to reflect that Lead Counsel will
 11 continue as the Fund Administrator for the Qualified Settlement Fund with The Notice Company
 12 continuing in its role as the Settlement Administrator.

13 *Finally*, after the filing of the Motion, The Notice Company (i) received and updated
 14 purchase numbers for certain claims that had previously been accepted and (ii) received requests on
 15 behalf of certain claimants that their claims be withdrawn. The Notice Company updated its data and
 16 made the appropriate modifications to the claims exhibits, and IPPs submitted an Amended
 17 Declaration with the updated data. *See* ECF No. 6029 (Amended Declaration of Joseph M. Fisher
 18 Re: Notice, Claims Processing and Distribution of Settlement Funds, ¶ 2, Exhibits D and E).
 19 Accordingly, the numbers of valid claims, CRT Products claimed, CRT Weighted Units claimed,
 20 and the CRT Weighted Unit values provided in the Motion (*see, e.g.*, ECF No. 6025 at 2, 7), must
 21 also be updated to be consistent with the Amended Fisher Declaration.

22 Accordingly, IPPs update the numbers provided in the Motion as follows: The Notice
 23 Company received a total of 156,467 claims through May 5, 2020 (the “Cutoff Date”). Amended
 24 Fisher Decl. ¶ 10. Of the claims received, 145,191 were Timely Claims (i.e., claims submitted by the
 25 Court-ordered deadlines described above) by End Users of CRT Products; the number of CRT
 26 Weighted Units claimed was 399,331,586,327. Another 5,269 claims were Timely Claims from
 27 Resellers; the number of CRT Weighted Units claimed was 1,267,379,393. *Id.* For End Users, The
 28 Notice Company received 4,901 Late Claims submitted by the Cutoff Date amounting to 43,373,930

1 CRT Weighted Units. For Resellers, the Settlement Administrator received 1,113 Late Claims
 2 submitted by the Cutoff Date amounting to 10,713,455 CRT Weighted Units. *Id.* ¶ 11.

3 The Notice Company reviewed and audited the claims received, and ultimately approved a
 4 total of 143,373 valid claims for purchases of 95,277,199 CRT Products, representing 273,146,112
 5 CRT Weighted Units. *Id.* ¶¶ 10-11; 25-28. The Notice Company has re-calculated the approximate
 6 dollar value of a CRT Weighted Unit for End Users to be approximately \$5.78. *Id.* ¶ 39. There is no
 7 change to the approximate CRT Weighted Unit value for Resellers. *Id.* ¶ 40.

8
 9 Dated: July 13, 2022

Respectfully submitted,

10 /s/ Mario N. Alioto

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